

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

---

TYLER ERDMAN,

Plaintiff,

against

ADAM VICTOR,

Defendant.

---

**Index No. 20-cv-4162 (LGS)  
(GWG)**

**DEFENDANT'S  
SUPPLEMENTAL  
RESPONSE TO PLAINTIFFS  
FIRST SET OF  
INTERROGATORIES**

Defendant ADAM VICTOR, (“Defendant”), by and through the undersigned counsel, hereby furnish this Supplemental Response to Plaintiff TYLER ERDMAN’S (“Plaintiff”) First Set of Interrogatories.

The Supplemental Responses herein reflect the knowledge of the Plaintiff as of the date of the Supplemental Responses, and Plaintiff’s Supplemental Responses involve an ongoing investigation into the Defendant’s Requests. Plaintiff’s Supplemental Responses are made subject to each of the General Objections, Comments and Qualifications listed below, and such other objections as may be stated in the individual Supplemental Responses. Plaintiff reserves the right to amend or supplement these Supplemental Responses pursuant to Federal Rule 26(e)(1) as becomes necessary and appropriate.

**DEFENDANT’S SUPPLEMENTAL RESPONSES TO FIRST SET OF  
INTERROGATORIES**

**Interrogatory No. 1:**

Fully identify all documents and persons with knowledge or documents relating to any claim in this action.

**Response to Interrogatory No. 1:**

Documents with knowledge relating to any claim are the court filings mentioned in Plaintiff’s Second Amended Complaint containing allegedly defamatory statements, as well as the written statements mentioned in Plaintiff’s Second Amended Complaint made to third parties, including governmental entities, containing allegedly defamatory statements, the H1-B Visa of Yevgeniya Khatskevich, and the Answer in this action to be filed December 1. Additional documents are the NY Post articles dated around

December 8, 2015 concerning the matters related to this case. Persons having knowledge include Yevgeniya Khatskevich and Nazym Toktassynova.

**Interrogatory No. 2:**

Fully identify all documents or persons related to each denial of a material allegation and each affirmative defense in your pleadings.

**Response to Interrogatory No. 2:**

Documents with knowledge relating to any claim are the court filings mentioned in Plaintiff's Second Amended Complaint containing allegedly defamatory statements, as well as the written statements mentioned in Plaintiff's Second Amended Complaint made to third parties, including governmental entities, containing allegedly defamatory statements, the H1-B Visa of Yevgeniya Khatskevich, and the Answer in this action to be filed December 1. Persons having knowledge include Yevgeniya Khatskevich and Nazym Toktassynova.

**Interrogatory No. 3:**

Fully identify all documents in support of your response to these interrogatories.

**Response to Interrogatory No. 3:**

Documents with knowledge relating to any claim are the court filings mentioned in Plaintiff's Second Amended Complaint containing allegedly defamatory statements, as well as the written statements mentioned in Plaintiff's Second Amended Complaint made to third parties, including governmental entities, containing allegedly defamatory statements, the H1-B Visa of Yevgeniya Khatskevich, and the Answer in this action to be filed December 1. Additional documents are the NY Post articles dated around December 8, 2015 concerning the matters related to this case. Persons having knowledge include Yevgeniya Khatskevich and Nazym Toktassynova.

**Interrogatory No. 4:**

Fully identify any documents or persons with knowledge regarding the allegations made in the Amended Complaint, and Affirmative Defenses asserted in the Answer to Counterclaims submitted in *Adam Victor, et al. v. Erdman v. Khatskevich*, Index No. 158981/2014 in the Supreme Court of the State of New York, New York County.

**Response to Interrogatory No. 4:**

Documents with knowledge relating to the Amended Complaint and Answer are the H1-B Visa and the Complaint of Yevgeniya Khatskevich in Index No. 151658/14. Additional documents are the NY Post articles dated around December 8, 2015 concerning the matters related to this case. Persons having knowledge include Plaintiff, Yevgeniya Khatskevich., Setec, Sonia Bozic, Oksana Chumanenko, Yigal Zohar, Francisco Filho, Nazym Toktasynnova, Steve Ingenito, Juan Perez, NYPD Detective

Richard Bradish, and John Brennan, Esq. Mr. Ingenito and Mr. Perez are retired law enforcement officers who drove Ns. Khatskevich and Ms. Toktassynova from time to time.

**Interrogatory No. 5**

Fully identify any documents or persons with knowledge regarding the allegations made in the Complaint filed in *Transnational Management Systems, LLC v. Tyler Erdman*, Case Id N15C-12-212 in the Superior Court of the State of Delaware in and for New Castle County (“Delaware Complaint”).

**Response to Interrogatory No. 5**

Documents are the NY Post articles dated around December 8, 2015 concerning the matters related to this case. A person with knowledge regarding those allegations made is Ken Lazar a financial person who was enlisted to secure financing for my aviation companies. My former Delaware counsel are the ones in possession of documents regarding the allegations made and those documents are protected by the attorney-client privilege. The Davidoff Hutcher law firm would also be in possession of documents regarding the allegations, but I am presently in an adverse possession with them as a result of litigation between them and myself.

**Interrogatory No. 6**

Fully identify all documents or persons with knowledge related to the claim made related to extortion, theft or any crimes as described in the Delaware Complaint.

**Response to Interrogatory No. 6**

Documents are the NY Post articles dated around December 8, 2015 concerning the matters related to this case. A person with knowledge regarding those allegations made is Ken Lazar. My former Delaware counsel are the ones in possession of documents regarding the allegations made and those documents are protected by the attorney-client privilege. The Davidoff Hutcher law firm would also be in possession of documents regarding the allegations, but I am presently in an adverse possession with them as a result of litigation between them and myself.

**Interrogatory No. 7**

Fully identify all documents or persons with knowledge related to the claim made in paragraph 48-50 of the Delaware Complaint.

**Response to Interrogatory No. 7**

Documents are the NY Post articles dated around December 8, 2015 concerning the matters related to this case. A person with knowledge regarding those allegations made is Ken Lazar. My former Delaware counsel are the ones in possession of documents regarding the allegations made and those documents are protected by the attorney-client privilege. The Davidoff Hutcher law firm would also be in possession of documents

regarding the allegations, but I am presently in an adverse possession with them as a result of litigation between them and myself. Detective Bradish is familiar with the matter of the stolen and deleted computer files. Pat Timlin, Esq, the former Deputy NYPD Police Commissioner, has his files and his notes from his talks with the NY District Attorney. Gil Kinderland, a former CIA person, as well as a detective agency he recommended, also were given this information. The law firm of Louis Free, former director of the FBI was provided this information as well. The list of stolen files provided by Mr Brennan was also used and well as spreadsheets of hard drives Mr. Erdman copied as derived by SETEC.

**Interrogatory No. 8**

Fully identify all documents or persons with knowledge related to the claim made in paragraph 71 of the Delaware Complaint.

**Response to Interrogatory No. 8**

Documents are the NY Post articles dated around December 8, 2015 concerning the matters related to this case. Persons with knowledge regarding those allegations made are Sonja Bozic, Steve Ingenito, Juan Perez, Viktor (my former trainer), and Nazym Toktassynova. My former Delaware counsel are the ones in possession of documents regarding the allegations made and those documents are protected by the attorney-client privilege. The Davidoff Hutcher law firm would also be in possession of documents regarding the allegations, but I am presently in an adverse possession with them as a result of litigation between them and myself.

**Interrogatory No. 9**

Fully identify all documents or persons with knowledge related to the computation of damages alleged in the Delaware Complaint.

**Response to Interrogatory No. 9**

Documents are the NY Post articles dated around December 8, 2015 concerning the matters related to this case. A person with knowledge regarding those allegations made is Ken Lazar. My former Delaware counsel are the ones in possession of documents regarding the allegations made and those documents are protected by the attorney-client privilege. The Davidoff Hutcher law firm would also be in possession of documents regarding the allegations, but I am presently in an adverse possession with them as a result of litigation between them and myself.

**Interrogatory No. 10**

Fully identify all documents or persons with knowledge related to the allegations made in the Complaint filed in Victor v. Khatskevich, Case Number 2019 CA 001264 B, in the Superior Court of the District of Columbia Civil Division.

**Response to Interrogatory No. 10**

Sonja Bozic, Steve Ingenito, Juan Perez, Viktor, and Yigal Zohar are the persons familiar with the allegations made in the DC complaint. Mr. Zohar is a Romanian businessman. Pat Timlin, Esq, the former Deputy NYPD Police Commissioner, has his files and his notes from his talks with the NY District Attorney. Gil Kinderland, a former CIA person, as well as a detective agency he recommended, also were given this information. The law firm of Louis Free, former director of the FBI was provided this information as well. The list of stolen files provided by Mr Brennan was also used and well as spreadsheets of hard drives Mr. Erdman copied as derived by SETEC.

**Interrogatory No. 11**

Fully identify all documents or persons with knowledge regarding employees, interns, persons or entities performing work for Victor, or any entities which he controls.

**Response to Interrogatory No. 11**

Persons in possession of documents are Plaintiff and Yevgeniya Khatskevich. Persons with knowledge include Sonja Bozic and Nazym Toktassynova.

**Interrogatory No. 12**

Fully identify any documents or persons with knowledge related to forensic analysis of electronic devices, forensic analysis of physical evidence, investigations, background checks or any other investigations performed in relation to Plaintiff, Khatskevich, and/or Tokatassynova.

**Response to Interrogatory No. 12**

Persons in possession of documents are Defendant's former attorneys at Schlam Stone, RVM (Defendant's first forensic firm), and Setec Investigations. Detective Richard Bradish is also in possession of documents with knowledge related to forensic analysis. Detective Bradish conducted the NYPD investigation into the stolen files and asked the DA to bring felony charges against both Erdman and Khatskevich. Pat Timlin, Esq, the former Deputy NYPD Police Commissioner, has his files and his notes from his talks with the NY District Attorney. Gil Kinderland, a former CIA person, as well as a detective agency he recommended, also were given this information. The law firm of Louis Free, former director of the FBI was provided this information as well. The list of stolen files provided by Mr Brennan was also used and well as spreadsheets of hard drives Mr. Erdman copied as derived by SETEC.

**Interrogatory No. 13**

Fully identify all documents or persons with knowledge related to any agreements drafted or executed involving cooperation, testimony, payments or similar relating to any legal actions involving Plaintiff, Khatskevich, Toktassynova.

**Response to Interrogatory No. 13**

There were no such agreements.

**Interrogatory No. 14**

Fully identify any documents or persons with knowledge related to Sonja Bozic's claim of "As your witness, I get 10%".

**Response to Interrogatory No. 14**

No persons or documents exist to the best of my knowledge responsive to this interrogatory.

**Interrogatory No. 15**

Fully identify any documents or persons with knowledge related to your claim that Erdman and Khatskevich did not perform work for Manhattan Place Condominium.

**Response to Interrogatory No. 15**

Persons in possession of documents are Defendant, Michael Rothschild, and Greg DeJong. Documents would be the business records maintained by MPC.

**Interrogatory No. 16**

Fully identify any documents or persons with knowledge relating to Victor offering or agreeing to indemnify Manhattan Place Condominium in actions relating to Plaintiff and/or Khatskevich.

**Response to Interrogatory No. 16**

Defendant never agreed to unilaterally indemnify MPC.

**Interrogatory No. 17**

Fully identify any documents or persons with knowledge relating to Victor or his agents' interactions with law enforcement or other government agencies as they relate to Plaintiff, Khatskevich or Toktasynnova.

**Response to Interrogatory No. 17**

Persons in possession of documents are the Defendant, Detective Richard Bradish, Schlam Stone, and the Davidoff Hatcher law firm. Pat Timlin, Esq, the former Deputy NYPD Police Commissioner, has his files and his notes from his talks with the NY District Attorney. Gil Kinderland, a former CIA person, as well as a detective agency he recommended, also were given this information. The law firm of Louis Free, former director of the FBI was provided this information as well. The list of stolen files provided by Mr Brennan was also used and well as spreadsheets of hard drives Mr. Erdman copied as derived by SETEC.

**Interrogatory No. 18**

Fully identify any documents or persons with knowledge related to a search of email accounts in or around November 2015 including but not limited to addresses used by Khatskevich, Toktasynnova, and Sonja Bozic.

**Response to Interrogatory No. 18**

Persons in possession of documents are Schlam Stone. Defendant gave access to a forensic firm hired by Davidoff Hutcher Law to harvest all the information from his computer – including passwords to his email accounts. They then harvested 100% of his computer files and were supposed to review them for production. Each successive law firm passed on the information to the succeeding law firm and have been produced.

**Interrogatory No. 19**

Fully identify any documents or persons with knowledge related to the deletion or loss of any evidence including but not limited to any email accounts, electronic information or hard copy records.

**Response to Interrogatory No. 19**

According to the NYPD, the only files deleted were those deleted by others. Defendant did not delete any files.

**Interrogatory No. 20**

Fully identify any documents or persons with knowledge related to any claims relating to criminal actions claimed to have been performed by Plaintiff, Khatskevich, or Toktasynnova.

**Response to Interrogatory No. 20**

Documents with knowledge related to claims involving criminal actions are Affidavits by Yevgeniya Khatskevich and the Plaintiff. Persons in possession of documents are NYPD Detective Richard Bradish, RVM and Setec forensic teams, Schlam Stone and attorney Brian Kennedy. Pat Timlin, Esq, the former Deputy NYPD Police Commissioner, has his files and his notes from his talks with the NY District Attorney. Gil Kinderland, a former CIA person, as well as a detective agency he recommended, also were given this information. The law firm of Louis Free, former director of the FBI was provided this information as well. The list of stolen files provided by Mr Brennan was also used and well as spreadsheets of hard drives Mr. Erdman copied as derived by SETEC.

**Interrogatory No. 21**

Fully identify any documents or persons with knowledge related to payments made to or for the benefit of Plaintiff including (sic) any of his entities, Khatskevich or Toktasynnova including any checks given to them, credit card transactions paid for, rent payments, school

payments or other considerations.

**Response to Interrogatory No. 21**

Plaintiff's interrogatory is not stated with sufficient precision as to enable an exact answer. To the extent Defendant is able to formulate Plaintiff's intent, all documents mentioned will be included in the upcoming document production. Another person who would be in possession of such documents is attorney Brian Kennedy.

**Interrogatory No. 22**

Fully identify any documents and the recipients of any communications regarding Plaintiff, Khatskevich, or Toktasynnova that mentions extortion, "hacking", theft or other criminal acts.

**Response to Interrogatory No. 22**

Persons in possession of documents are various former and current attorneys of Defendant, RVM, and Setec. Detective Bradish of the NYPD has his files and the NYPD has the hard drives. Pat Timlin, Esq, the former Deputy NYPD Police Commissioner, has his files and his notes from his talks with the NY District Attorney. Gil Kinderland, a former CIA person, as well as a detective agency he recommended, also were given this information. The law firm of Louis Free, former director of the FBI was provided this information as well. The list of stolen files provided by Mr Brennan was also used and well as spreadsheets of hard drives Mr. Erdman copied as derived by SETEC.

**Interrogatory No. 23**

Fully identify any documents or persons with knowledge regarding any efforts to retaliate against Plaintiff, Khatskevich and/or Toktasynnova.

**Response to Interrogatory No. 23**

Defendant states there were no efforts to retaliate against anyone.

**Interrogatory No. 24**

Fully identify any physical evidence and its custodian related to any claims of criminal acts or the furtherance of extortion including any hard drives, or electronic devices claimed to have been improperly accessed by Plaintiff or Khatskevich.

**Response to Interrogatory No. 24**

Persons in possession of documents and/or drives are the NYPD and Setec. Documents held by Setec will be included in upcoming document production. Detective Bradish of the NYPD has his files and the NYPD has the hard drives. Pat Timlin, Esq, the former Deputy NYPD Police Commissioner, has his files and his notes from his talks with the NY District Attorney. Gil Kinderland, a former CIA person, as well as a detective agency he



recommended, also were given this information. The law firm of Louis Free, former director of the FBI was provided this information as well. The list of stolen files provided by Mr Brennan was also used and well as spreadsheets of hard drives Mr. Erdman copied as derived by SETEC.

**Interrogatory No. 25**

Fully identify all persons involved in the preparation of answers to these Interrogatories.

**Response to Interrogatory No. 25**

Persons involved were the Defendant and his attorneys.

Dated: Brooklyn, New York  
January 7, 2022

\_\_\_\_\_/s/ Adam Victor\_\_\_\_\_

TO: Tyler Erdman  
Salt Lake City, UT

**VERIFICATION**

I, Adam Victor, verify that I have read the foregoing Defendant's Response to Plaintiff's First Set of Interrogatories, by Plaintiff Tyler Erdman and that the answers contained therein are true and correct to the best of my information, knowledge, and belief.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on December 3, 2021

\_\_\_\_\_/s/Adam Victor\_\_\_\_\_